

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: Jeffery G. D'Antonio, : Chapter 13  
Debtor : Case No. 23-11097-amc**

**RESPONSE OF DELAWARE COUNTY TAX CLAIM BUREAU TO  
DEBTOR'S MOTION FOR APPROVAL OF SALE OF REAL ESTATE**

The Delaware County Tax Claim Bureau hereby responds to Debtor's Motion for Approval of Sale of Real Estate and respectfully avers as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.
9. Admitted.
10. Admitted.
11. Admitted. By way of further response, no information or pay off figure is provided in the Motion.
12. Admitted. By way of further response, the amount due the Delaware County Tax Claim Bureau, as of May 2024, exceeds \$18,200.00 and is not fully referenced in the Proposed Order nor are the current taxes accounted for in the Proposed Order.
13. Admitted. By way of further response, Debtor fails to identify the other liens of record or a calculation to determine if the sale is sufficient to satisfy said liens.

14. Admitted.

15. Admitted

16. Admitted. By way of further response, the Motion fails to indicate the costs anticipated by Debtor.

17. Admitted.

18. Admitted.

**WHEREFORE**, the Delaware County Tax Claim Bureau respectfully requests this Honorable Court enter an Order approving Debtor's Motion for Approval of Sale of Real Estate with provisions for the payment of all real estate taxes due on the property prior to any other liens of record or other costs or fees.

Respectfully submitted,

**TOSCANI, STATHES & ZOELLER, LLC**

Dated: **5/15/2024**

/s/ Stephen V. Bottiglieri  
Stephen V. Bottiglieri, Esquire  
Attorney for the Delaware County Tax Claim Bureau  
899 Cassatt Rd, Ste 320  
Berwyn, PA 19312  
P (610) 647-4901  
[sbottiglieri@tszlegal.com](mailto:sbottiglieri@tszlegal.com)